



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

July 12, 2004

Certified Mail No. 7000 1670 0013 8129 1253

Mr. Stuart Barclay, President
Summit Seed Coatings, Seed Enhancements LLC
P.O. Box E
Caldwell, ID 83606

RE: Permit No. T2-030054, Summit Seed Coatings, Seed Enhancements LLC, Caldwell
Final Tier II Operating Permit and Permit to Construct

Dear Mr. Barclay:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit and Permit to Construct No. T2-030054 for Summit Seed Coatings, Seed Enhancement LLC, in accordance with the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively.

The enclosed permit is effective immediately and is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the *Rules for the Control of Air Pollution in Idaho*.

A representative of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, DEQ encourages you to contact Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, reading "Martin Bauer", is positioned above the typed name.

Martin Bauer, Administrator
Air Quality Division

MB/HE/sd
Enclosure

AIRS Facility ID No. 027-00090



**Air Quality
TIER II OPERATING PERMIT
And
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-030054

FACILITY ID No.: 027-00090

AQCR: 64

CLASS: SM

SIC: 0723

ZONE: 11

UTM COORDINATE (km): 526.0, 4834.8

1. PERMITTEE

Summit Seed Coatings, Seed Enhancements LLC

2. PROJECT

Facility-wide Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS

P.O. Box E

CITY

Caldwell

STATE

ID

ZIP

83606

4. FACILITY CONTACT

Stuart Barclay

TITLE

President

TELEPHONE

(208) 455-8009

5. RESPONSIBLE OFFICIAL

Stuart Barclay

TITLE

President

TELEPHONE

(208) 455-8009

6. EXACT PLANT LOCATION

710 N 11 Avenue, Caldwell, Idaho

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Seed treatment processing plant

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ's) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 *Rules for the Control of Air Pollution in Idaho*.


TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 12, 2004

DATE EXPIRES: July 12, 2009

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
g/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
lb/day	pounds per day
MMBtu/hr	million British thermal units per hour
NO _x	nitrogen oxides
O&M	operation and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
Summit	Summit Seed Coatings
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-030054

Permittee:	Summit Seed Coatings	Facility ID No. 027-00090	Date Issued:	July 12, 2004
Location:	Caldwell, Idaho		Date Expires:	July 12, 2009

1. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT SCOPE**Purpose**

- 1.1 This facility-wide permit establishes enforceable requirements to limit the facility's potential to emit and to protect ambient air quality standards. This Tier II operating permit and permit to construct are required to satisfy the requirements of IDAPA 58.01.01 Subparts 400 et seq. and 200 et seq., *Rules for the Control of Air Pollution in Idaho*.

Regulated Sources

- 1.2 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Facility-wide (all affected emissions sources)	N/A
3	<u>South and North Baghouses</u> Sources that exhaust their air through the south baghouse stack are: limestone silo, limestone/gypsum receiver, seed mixer, bottom surge hopper compaction drum, fluidized bed dryer	Baghouse (Manufacturer: Southern Felt Company, Model: PE-16-SPEG-84)
	Sources that exhaust their air through north baghouse stack are: fluidized bed dryer, cooling deck	Baghouse (Manufacturer: Southern Felt Company, Model: PE-16-SPEG-84)

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2. FACILITY-WIDE CONDITIONS***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution, in accordance with IDAPA 58.01.01.775-776.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Fuel-Burning Equipment

- 2.10 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

Air Stagnation Advisory Days

- 2.11 The permittee shall comply with IDAPA 58.01.01.550-562, *Air Pollution Emergency Rule*.

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Permittee:	Summit Seed Coatings	Facility ID No. 027-00090	Date Issued:	July 12, 2004
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Open Burning

- 2.12 The permittee shall comply with IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

Sulfur Content

- 2.13 No diesel fuel oil containing sulfur in excess of 0.5% by weight shall be burned at the facility.
- 2.14 The facility shall maintain purchase records or equivalent from the fuel oil supplier clearly indicating the sulfur content of the fuel oil on an as-received basis.

Monitoring and Recordkeeping

- 2.15 The permittee shall maintain sufficient record keeping to assure compliance with the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.16 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239

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3. SOUTH BAGHOUSE AND NORTH BAGHOUSE**3.1 Process Description**

Summit Seed Coatings (Summit) has been operating since August 2002. Summit treats seeds such as grass, alfalfa, clover, barley and legumes with a mixture coating materials such as limestone (calcium carbonate), gypsum (calcium sulfate), iron chelate, calcium phosphate, fungicide, adhesives, peat inoculants and colorants. Summit's process equipment includes a limestone silo, a limestone/gypsum tank, seed and additives tanks, a limestone mixer, a surge hopper, a rolling drum, a 5-MMBtu/hr natural gas-fired burner (that provides heat to fluidized bed dryers), and a screening machine. A large warehouse building at Summit's facility houses the office, process equipment, and storage operations.

Seeds are transferred to the limestone mixer from the seed tank. Depending on the type of required coating on the seeds, some of the coating materials are transferred to the limestone mixer from their tanks. After seeds are mixed with the coating material in the mixer, they are transferred to a rolling drum. Then coated seeds are transferred to a fluidized bed dryer. Heat from the 5-MMBtu/hr natural gas-fired burner is blown into the fluidized bed dryer to allow the coated seed to achieve the necessary moisture content. The coated seeds are then transferred to an ambient temperature fluidized bed dryer to cool before screening and packaging.

Air that is utilized in the fluidized bed dryers passes through the baghouses. The process air contains combustion gases (i.e., CO, NO_x, SO₂, and VOC) and particulate matter from the limestone powder mix that has not adhered to the seeds. The baghouses capture only process particulate from the limestone mixer, the limestone silo loading, the fluidized beds, and process dust. Carbon monoxide, NO_x, SO₂, and VOC emissions will be uncontrolled. It is assumed that emissions from the process equipment and process dust are equally divided between the two baghouses.

The south and north baghouse each have a particulate matter control efficiency of 99.99%. This efficiency is guaranteed by the manufacturer (Southern Felt Filtration Products, dated October 26, 2002).

Table 3.1 SOUTH AND NORTH BAGHOUSE EMISSIONS UNITS DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Emissions units that exhaust to the south baghouse are: limestone silo loading, limestone/gypsum receiver, seed mixer, bottom surge hopper, compaction drum, fluidized bed dryers, and process dust.	Baghouse	South baghouse
Emissions units that exhaust to the north baghouse are: compaction drum, bottom surge hopper, fluidized bed dryers, and process dust.	Baghouse	North baghouse

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Emissions Limits**3.2 Emissions Limits**

The emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) from each of the south baghouse and north baghouse stacks shall not exceed any corresponding emissions rate limit listed in Table 3.2.

Table 3.2 SOUTH BAGHOUSE AND NORTH BAGHOUSE STACKS EMISSIONS LIMITS

SOURCE	PM ₁₀	
	lb/day	T/yr
South Baghouse Stack	0.55	0.1
North Baghouse Stack	0.55	0.1

3.3 Visible Emissions Limit

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements**3.4 Pressure Drop Monitoring Device**

The permittee shall install, calibrate, operate, and maintain, pressure drop monitoring devices to continuously measure the differential pressure drop across the south baghouse and north baghouse. The pressure drop monitoring devices shall be calibrated and maintained according to the manufacturer's operations and maintenance (O&M) manual specifications. Documentation of the manufacturer's recommended operating specifications shall remain on site at all times, and shall be made available to DEQ representatives upon request. The permittee shall keep records of all baghouse maintenance for a period of five years, in accordance with Permit Condition 2.15.

3.5 Baghouse Pressure Drop and Maintenance

The static pressure drop across the south baghouse and north baghouse shall be maintained within manufacturer specifications and O&M manual specifications. Documentation of the operating pressure drop specifications for each baghouse shall remain on site at all times, and shall be made available to DEQ representatives upon request.

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Monitoring and Recordkeeping Requirements**3.6 Operations and Maintenance Manual**

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the south baghouse and north baghouse, and the pressure drop monitoring devices required by Permit Condition 3.4. The O&M manual shall address the operation, maintenance, and repair of each of the baghouses and shall, at a minimum, include the minimum and maximum pressure drop range across each baghouse, methods of preventing malfunctions, and a schedule for routine inspection. The O&M manual shall be maintained on site at all times and shall be made available to DEQ representatives upon request.

3.7 Monitoring and Recordkeeping Requirements

- The permittee shall monitor and record the pressure drop across the north baghouse and the pressure drop across the south baghouse once each day while the baghouses are operating. Records of this information shall remain on site for the most recent five year period and shall be made available to DEQ representatives upon request. This requirement does not apply on days when processes associated with the north baghouse and the south baghouse are not in operation.
- The permittee shall monitor and record the visible emissions from the north baghouse stack and the south baghouse stack as required by Permit Condition 2.8 to demonstrate compliance with Permit Condition 3.3.

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4. APPENDIX A – EMISSION LIMITS

Table 4.1 provides a summary of all emissions rate limits required by this permit.

Summit Seed Coatings, Caldwell**Table 4.1 EMISSIONS LIMITS^a DAILY (LB/DAY)^b AND ANNUAL^c (T/YR)^d**

SOURCE	PM ₁₀	
	lb/day	T/yr
South Baghouse Stack	0.55	0.1
North Baghouse Stack	0.55	0.1

^a As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or by DEQ's emissions estimation methods used in the permit application analysis.

^b pounds per 24-hour

^c As determined by multiplying the actual or allowable (if actual is not available) pounds per hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^d tons per consecutive 12-month period

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5. PERMIT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. In the event of any change in control or ownership of source(s) covered by this permit, the permittee and succeeding owner or controller shall notify DEQ of the change in ownership. Any proposed change(s) or modification(s) to this permit by the succeeding owner or controller shall be requested in accordance with the *Rules for the Control of Air Pollution in Idaho*.
6. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
7. The Director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
8. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.